

EXHIBIT A

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16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,

Case No. 5:23-CR-00021-JGB

19 Plaintiff,

20 vs.

21 JASON EDWARD THOMAS
22 CARDIFF

23 And

24 LILIA MURPHY and BRIAN
25 KENNEDY

26 Sureties

27 **DECLARATION OF LILIA MURPHY COCHELL IN SUPPORT OF RESPONSE TO**
28 **GOVERNMENT'S MOTION FOR ORDER FORFEITING BAIL AND FOR SUMMARY**
ADJUDICATION OF OBLIGATION

I, Lilia Murphy Cochell, declare as follows:

1. I have personal knowledge of the facts set forth herein. If called as a

1 witness, I could and would competently testify to the matters stated
2 herein. I make this declaration to address the Government's Motion
3 for Order Forfeiting Bail and for Summary Adjudication.

- 4
- 5 2. I am married to Stephen Cochell, who represents Jason Cardiff in this
6 criminal case and who is also General Counsel for Redwood Scientific
7 Technologies, Inc. I have signed a waiver of conflict of interest to allow
8 my husband to represent me in the Government's request to forfeit bond
9 and to also represent Mr. Kennedy and Mr. Cardiff.
- 10 3. I am one of the bondholders who signed an affidavit of surety and
11 pledged my home as security if Jason Cardiff did not comply with his
12 bond conditions.
- 13 4. I have been a law-abiding citizen all my life working and always try to do
14 the right thing the right way. I have always been a private person and do
15 not disclose the details of my life to others.
- 16 5. As background, I was born in Mexico City in 1952 and grew up in San
17 Diego, California and completed high school. My family was poor and
18 had modest means. However, I worked very hard in the auto industry
19 and mortgage industry to improve my life style and better the lives of my
20 daughters. I also managed an optometry store. I was married to Dr.
21 Robert Giarratano for over thirty years. After our divorce, I married Dr.
22 Leo Murphy for ten years and managed his practice. In 2021, Leo and I
23 relocated to Texas in 2021. We purchased a home in Houston Texas. We
24 helped my grand son and daughter buy a home near our house. Leo
25 passed away in 2022 and it was a devastating blow but I had my daughter
26 and grandson near. A year after Leo's passing, my daughters and I were
27 stricken with another devastating tragedy when my only grandson (age
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1 23) passed away in a freak accident.

2 6. When my grandson passed, my daughter could not live in Texas anymore
3 and moved to Oregon to live with my other daughter. This left me in
4 Texas without friends or family. I had been dating Steve Cochell a few
5 months before my grandson died. Steve saved me from falling into deep
6 depression and feeling suicidal. We moved in together.

7 7. I was living with Steve Cochell when I first met Mr. Cardiff. I
8 understood that Mr. Cardiff was in detention and would remain in jail
9 until his trial unless he made bail. Steve told me that the Court was
10 potentially open to having Jason released to his custody to live with us.
11 The Government wanted \$500,000. I felt compelled to help. I also
12 understood that Jason Cardiff would have an ankle bracelet that
13 electronically monitored him and an 8:00 a.m. to 8:00 p.m. curfew and
14 other conditions of release including regular contact with Pretrial Service.
15 On that basis, I felt confident to pledge my home that my husband and I
16 would have control over the situation and could oversee Mr. Cardiff's
17 bond conditions.
18

19 8. Mr. Cardiff arrived in December 2023. He lived upstairs in my home,
20 shared meals with us and was a good house guest. Mr. Cardiff cooked
21 and helped maintain the house and trained my three dogs. He is smart,
22 talented and friendly. I also found him very trustworthy and was reliable
23 in what he said and did around me and Steve. Steve and I were married
24 on May 11, 2024. Jason Cardiff attended the wedding.

25 9. Mr. Cardiff stayed at our home and complied with the 8 to 8 curfew. He
26 occasionally went on business trips. He kept us informed of his schedule
27 and checked in with me or Steve while he was out of town. I understood
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1 that each of these trips were coordinated and approved by the Court and
2 Pretrial Services.

3 10. After he moved in, Mr. Cardiff was so grateful that I had helped bail him
4 out that he offered to give me 900,000 shares of stock in Redwood. I told
5 him that it was unnecessary because I did not expect anything in return
6 for helping him. I thought it was kind of him, but I basically saw the
7 shares as monopoly money and still do.

8 11. In or about October, 2024, Mr. Cardiff applied for and was granted
9 permission by the Court to travel to Ireland for ten days after his wife
10 suffered a heart attack. He returned on the deadline set by the Court.

11 12. In or about November, 2023, Mr. Cardiff applied for and was granted
12 permission by the Court to travel back to Ireland to assist his wife and
13 daughter and to visit his pulmonologist.

14 13. As I got to know Mr. Cardiff, I came to know more about his health and I
15 found his health to be fragile. I believed that he was a potential candidate
16 for a heart attack given his medical condition and all the stress he
17 experienced over the years including chronic asthma. I noticed that Jason
18 was coughing daily. I observed that he had problems going up and down
19 the stairs and difficulty breathing. I witnessed on several occasions that
20 he had uncontrolled coughing fits. He asked me to look out for him
21 because he had prior episodes of uncontrollable coughing and passing
22 out.
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24 14. Mr. Cardiff was an early riser. On several occasions when he was not up
25 early, I had my husband go upstairs to make sure he was alive.

26 15. Both of us had COVID in October, 2024, which seemed to increase
27 Jason's coughing fits. It took Jason longer to get over COVID and he
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1 was having even more difficulty going up and down the stairs. Sometime
2 in November, 2024, after he tested negative for COVID, Jason applied to
3 go back to Ireland and planned to see his pulmonologist.

4 16. When he got to Ireland in November, Jason told me that he got COVID
5 again and told me that the second COVID illness was more difficult than
6 the COVID episode in October.

7 17. After he saw his doctor in Ireland, he told me about the visit and told me
8 about his medical problems. I asked "Are you coming back?" He replied
9 "Of course, I'm coming back. I would never do that to you. I would
10 never want to be a fugitive" He then asked if he could have the
11 downstairs bedroom when he came back. I believed and trusted him.

12 18. I understand that he made appointments with various doctors to get to the
13 root cause of this problem. I also understand that his General Practitioner
14 found that he was medically unfit to travel and submitted a treatment plan
15 to the Court. I understand that this plan was rejected by the Court and
16 that the Court ordered him to return on January 19, 2025.

17 19. I am not a doctor. All I know is that, before he left, Jason Cardiff's
18 symptoms needed to be evaluated and treated by a doctor. I have not
19 been in a position to observe Jason's current medical problems but the
20 symptoms he says he has are consistent with what I witnessed all along
21 while he was in Houston.

22 20. In January (before the January 19 deadline) and early February, I had
23 discussions with Jason about his status in Ireland. I told him that
24 although he had medical problems, he was putting my home at risk and
25 that he needed to return to Houston to cure that problem. Jason told me
26 that he wanted to return but that his doctors told him that he would suffer
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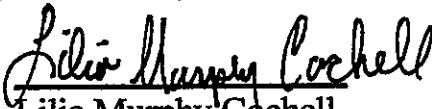
1 even greater and irreversible damage to his health if he flew before they
2 could treat him.

3 21. For me, my home is my refuge and security. I am a "home-body" with
4 my husband and three dogs. I did sign the Affidavit of Surety and
5 understood that my house might be at risk if there was a violation of the
6 bond conditions. However, we did assure Jason's compliance with the
7 bond conditions while he was under our control and living at our house in
8 Houston. I do not think it would be fair to lose my home for actions
9 taken by Jason that are beyond my control and which I do not support.

10 22. This is a summary of events. I reserve the right to supplement my
11 testimony if called as a witness at hearing or trial.

12 I declare under penalty of perjury under the laws of the United States of
13 America that the foregoing is true and correct.

14 Executed on this 10th day of February 2025, at Houston, Texas.

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16 Lilia Murphy Cochell
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